

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TIFFANY JORDAN,

Plaintiff,

v.

GOHEALTH, LLC,

Defendant.

Case No. 21-cv-4736

Honorable Ronald A. Guzman

Magistrate Judge Beth W. Jantz

**JOINT MOTION FOR  
ENTRY OF AGREED CONFIDENTIALITY ORDER**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure and the Court’s Standing Order on Confidentiality or Protective Orders, Plaintiff Tiffany Jordan (“Plaintiff”) and Defendant GoHealth, LLC (“GoHealth”), by and through their attorneys, hereby move this Court for entry of an Agreed Confidentiality Order. In support of this motion, the parties state as follows:

1. Federal Rule 26(c) authorizes the Court to enter a protective order regarding discovery for good cause shown. Fed. R. Civ. P. 26(c).

2. The parties anticipate that confidential materials will be disclosed during the course of this litigation. Such materials may include, but are not limited to, confidential information related to GoHealth’s business and records containing personal identifying information. Accordingly, good cause exists for the issuance of a protective order because the confidential materials described above merit protection from public disclosure.

3. The parties have conferred and agreed upon the entry of a proposed Agreed Confidentiality Order, which separately will be submitted for consideration by the Court.

WHEREFORE, the parties respectfully request that the Court grant this motion and enter the parties’ Agreed Confidentiality Order.

Dated: March 11, 2022

**TIFFANY JORDAN**

By: /s/ James L. Simon

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*Counsel for Plaintiff Tiffany Jordan*

Respectfully submitted,

**GOHEALTH, LLC**

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*Counsel for Defendant GoHealth, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this 11th of March, 2022, electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send an e-mail notification of such filing to all counsel of record.

/s/ Jason C. Kim  
*Counsel for Defendant GoHealth, LLC*